

## WRIGHT, FINLAY & ZAK, LLP

Darren T. Brenner, Esq.

Nevada Bar No. 8386

Lindsay D. Dragon, Esq.

Nevada Bar No. 13474

7785 W. Sahara Ave., Suite 200

Las Vegas, NV 89117

(702) 475-7964; Fax: (702) 946-1345

ldragon@wrightlegal.net

*Attorneys for Plaintiff, HSBC Bank USA, N.A., As Trustee For The Registered Holders Of Nomura Home Equity Loan, Inc., Asset-Backed Certificates, Series 2006-HE2*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

HSBC BANK USA, N.A., AS TRUSTEE  
FOR THE REGISTERED HOLDERS OF  
NOMURA HOME EQUITY LOAN, INC.,  
ASSET-BACKED CERTIFICATES, SERIES  
2006-HE2,

Plaintiff,  
vs.

FIDELITY NATIONAL TITLE INSURANCE  
COMPANY,

**Defendant.**

Case No.: 3:19-CV-00265-MMD-CSD

**STIPULATION AND ORDER TO  
EXTEND TIME PERIOD TO RESPOND  
TO MOTION TO DISMISS [ECF No. 50]**

## [First Request]

Plaintiff, HSBC Bank USA, N.A., As Trustee For The Registered Holders Of Nomura Home Equity Loan, Inc., Asset-Backed Certificates, Series 2006-HE2 (“HSBC”) and Defendant Fidelity National Title Insurance Company (“Fidelity”), by and through their counsel of record, hereby stipulate and agree as follows:

1. On January 18, 2022, HSBC filed its First Amended Complaint [ECF No. 47];
  2. On January 28, 2022, Fidelity filed a Motion to Dismiss [ECF No. 50];
  3. HSBC's deadline to respond to Fidelity's Motion to Dismiss is currently February 11, 2022;
  4. HSBC's counsel is requesting a brief one-week extension until February 18, 2022, to file its response to the pending Motion;

- 1       5. This extension is requested to allow counsel for HSBC additional time to review and  
2                   respond to the points and authorities cited to in the pending Motion;  
3       6. Counsel for Fidelity does not oppose the requested extension;  
4       7. This is the first request for an extension which is made in good faith and not for  
5                   purposes of delay.

6       **IT IS SO STIPULATED.**

7       DATED this 11<sup>th</sup> day of February, 2022.

8       WRIGHT, FINLAY & ZAK, LLP

10      /s/ Lindsay D. Dragon

11      Lindsay D. Dragon, Esq.  
12      Nevada Bar No. 13474  
13      7785 W. Sahara Ave., Suite 200  
14      Las Vegas, NV 89117  
15      *Attorneys for Plaintiff, HSBC Bank USA,  
N.A., As Trustee For The Registered Holders  
Of Nomura Home Equity Loan, Inc., Asset-  
Backed Certificates, Series 2006-HE2*

DATED this 11<sup>th</sup> day of February, 2022.

EARLY SULLIVAN WRIGHT GIZER &  
McRAE LLP

/s/ Sophia S. Lau

Sophia S. Lau, Esq.  
Nevada Bar No. 13365  
8716 Spanish Ridge Avenue, Suite 105  
Las Vegas, Nevada 89148  
*Attorney for Defendant, Fidelity National  
Title Insurance Company*

18       **IT IS SO ORDERED.**

19       Dated this 14th day of February, 2022.



21                   UNITED STATES DISTRICT JUDGE